

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSEPH GAROFALO,

Plaintiff, 22-CV-7620 (NRM)(VMS)

-against-

NEW YORK CITY, New York, and KEECHANT
SEWELL, in her official capacity,

RULE 502(d) ORDER

Defendants.

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1. Any party's production or disclosure in this proceeding of information or material that is protected by any privilege or protection recognized by law and/or contains personally identifiable or sensitive non-responsive information (collectively, "Protected Material"), whether inadvertent or otherwise, shall not waive any claim of privilege, protection, personally identifiable information, and/or non-responsiveness applicable to that material or its subject matter in this Action or any other federal or state proceeding and shall be governed by the procedures set forth herein. This Stipulation and Order shall be interpreted to provide the maximum protection allowed by FRE 502(d), FRCP 26(c), and any other applicable law; and shall specifically preclude the application of FRE 502(b).

2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

THE BELLANTONI LAW FIRM, PLLC
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By: Amy L. Bellantoni
Amy L. Bellantoni

Dated: New York, New York
January 22, 2025

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By: 
Nicholas R. Ciappetta/Genan F. Zilkha
Assistant Corporation Counsel

Dated: New York, New York
January 22, 2025

SO ORDERED:

Dated: _____
New York